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17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**

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IN RE SENTINELONE, INC.
STOCKHOLDER DERIVATIVE
LITIGATION

Lead Case No. 4:24-cv-01934-HSG
(Consolidated with Case No. 4:24-cv-02096-HSG)

**STIPULATION AND ORDER OF
VOLUNTARY DISMISSAL WITH
PREJUDICE PURSUANT TO FED. R. CIV. P.
41(a)(2) AND 23.1(c)**

This Document Relates to:

ALL ACTIONS

Judge: Honorable Haywood S. Gilliam, Jr.

1 Plaintiffs Joel Newman (“Plaintiff Newman”) and Walter Stochovski (“Plaintiff
 2 Stochovski,” and together with Plaintiff Newman, the “Plaintiffs”), Defendants Tomer Weingarten,
 3 David Bernhardt, Charlene T. Begley, Aaron Hughes, Mark S. Peek, Ana Pinczuk, Daniel
 4 Scheinman, Teddie Wardi, and Jeffrey W. Yabuki (collectively, the “Individual Defendants”), and
 5 Nominal Defendant SentinelOne, Inc. (“SentinelOne” or the “Company,” and together with the
 6 Individual Defendants, “Defendants,” and together with the Plaintiffs, the “Parties”), by and through
 7 their undersigned counsel of record, jointly submit this stipulation and proposed order to voluntarily
 8 dismiss the above-captioned action (the “Consolidated Action”) with prejudice pursuant to Rules
 9 41(a)(2) and 23.1(c) of the Federal Rules of Civil Procedure, as set forth below.

10 WHEREAS, on June 5, 2024, the Court entered an order staying the above-captioned action
 11 until the resolution of a related securities class action captioned *In re SentinelOne, Inc. Securities*
 12 *Litigation*, Case No. 4:23-cv-02786-HSG (N.D. Cal.) (the “Securities Class Action”) and directing
 13 the Parties to submit a proposed schedule to the Court once the stay was lifted (the “Stay Order”);

14 WHEREAS, on October 2, 2025, the Court granted defendants’ motion to dismiss the
 15 Securities Class Action without leave to amend;

16 WHEREAS, given the dismissal of the related Securities Class Action, Plaintiffs have
 17 determined that it is not in the best interests of SentinelOne or themselves to continue the litigation
 18 of the above-captioned action;

19 WHEREAS, counsel for Plaintiffs have consulted with counsel for Defendants about the
 20 voluntary dismissal of the above-captioned action;

21 WHEREAS, notice of dismissal of the above-captioned action will be provided to
 22 SentinelOne stockholders via the Company’s filings with the United States Securities and Exchange
 23 Commission (“SEC”); and

24 WHEREAS, no compensation in any form has passed directly or indirectly from any of the
 25 Defendants to Plaintiffs or Plaintiffs’ attorneys, and no promise to give any such compensation has
 26 been made.

1 **NOW, THEREFORE, IT IS HEREBY STIPULATED BY THE PARTIES**
2 **THROUGH THEIR UNDERSIGNED COUNSEL, AND SUBJECT TO THE APPROVAL**
3 **OF THE COURT, THAT:**

4 1. Pursuant to Federal Rules of Civil Procedure 41(a)(2) and 23.1(c), the Consolidated
5 Action is dismissed with prejudice as to all claims and causes of action, with each party bearing
6 their own attorneys' fees and costs; and

7 2. The Parties agree that all counsel have each complied with their obligations under
8 Rule 11 of the Federal Rules of Civil Procedure.

9 Dated: October 21, 2025

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

/s/ Alex J. Tramontano

ALEX J. TRAMONTANO

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Local Counsel for Plaintiffs

19 Dated: October 21, 2025

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/s/ Correy A. Suk

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Co-Lead Counsel for Plaintiffs

1 Dated: October 21, 2025

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Co-Lead Counsel for Plaintiffs

10 Dated: October 21, 2025

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Counsel for Defendants

19 ***

20 **ATTESTATION OF CONCURRENCE**

21 I, Alex J. Tramontano, attest pursuant to Local Rule 5-1(i)(3) that all other signatories to
22 this document, on whose behalf this filing is submitted, concur in the filing's content and have
23 authorized this filing.

24 /s/ Alex J. Tramontano
ALEX J. TRAMONTANO


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ORDER

Pursuant to the Parties' Stipulation, IT IS HEREBY ORDERED as follows:

1. This action is dismissed with prejudice in its entirety;
2. All parties shall bear their own costs and attorneys' fees incurred in this action;
3. Entry of this order and filings by SentinelOne with the SEC shall serve as notice to the Company's shareholders pursuant to Federal Rule of Civil Procedure 23.1(c); and
4. The Clerk is directed to close the file.

SO ORDERED this 22nd day of October, 2025.


HON. HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE